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NO ENDORSEMENT

September 11, 2024

9/11/24

By ECF

Hon. Colleen McMahon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Case adj to Oct 30, 2024
at noon
And time excluded through
that date in the interest
of justice, to facilitate
plea discussions.

Re: *United States v. Khaim Mavlyanov, 23 Cr. 415 (GM)*

Colleen Mc Mahon

Dear Judge McMahon:

The parties respectfully write to request an adjournment of the next status conference in the above-captioned matter, currently scheduled for September 12, 2024, to October 30, 2024 at 12:00 p.m., which the parties understand is a date and time convenient for the Court.

The parties respectfully request that the time between today and the adjourned status conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). We submit that the ends of justice served by the granting of the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow the parties to continue discussions regarding the possibility of pretrial resolution of this case.

Respectfully submitted,

/s/ James Kousouros
James Kousouros, Esq.

c.c. All Counsel of Record (By ECF)

